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**From:** Courtney Corbello <Courtney.Corbello@oag.texas.gov>  
**Sent:** Monday, November 1, 2021 12:12 PM  
**To:** Todd Disher  
**Cc:** Scott Keller; Matt Frederick; Benjamin Lyles; Christopher Hilton; Benjamin Walton; Thomas Ray  
**Subject:** RE: Activity in Case 1:21-cv-00840-RP NetChoice LLC et al v. Paxton Order on Motion to Expedite

Todd,

No thank you.

Could you please send along Plaintiffs' proposed changes, if any, to the protective order draft we sent over last week? I'd like to get that filed tomorrow so the Court has time to rule on it before depositions happen.

Can you also send the proposed dates and times for each of the depositions by tomorrow? We will need time to schedule travel.

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**From:** Todd Disher <todd@lehotskykeller.com>  
**Sent:** Monday, November 1, 2021 9:37 AM  
**To:** Courtney Corbello <Courtney.Corbello@oag.texas.gov>  
**Cc:** Scott Keller <scott@lehotskykeller.com>; Matt Frederick <matt@lehotskykeller.com>; Benjamin Lyles <Benjamin.Lyles@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Benjamin Walton <Benjamin.Walton@oag.texas.gov>; Thomas Ray <Thomas.Ray@oag.texas.gov>  
**Subject:** Re: Activity in Case 1:21-cv-00840-RP NetChoice LLC et al v. Paxton Order on Motion to Expedite

Good morning, Courtney,

To circle back to this, I do know that Facebook would agree to additional document production topics similar to what Google proposed on Thursday as a way to put an end to our discovery dispute. Please let us know if you'd like to discuss this proposed solution in exchange for pulling down the subpoenas that are now the subject of Plaintiffs' motion for protective order.

Todd

Todd Disher | LEHOTSKY KELLER | [todd@lehotskykeller.com](mailto:todd@lehotskykeller.com)